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April 21, 2017

VIA ECF

MEMO ENDORSED  
P.2

The Honorable Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Reza Zarrab, et al., S3 15 Cr. 867 (RMB)**

Dear Judge Berman:

We represent Defendant Mehmet Hakan Atilla in the above-captioned matter. We write in response to questions posed by the Court at Mr. Atilla's arraignment on April 13<sup>th</sup> regarding (a) our intent with respect to making a written submission in connection with the *Curcio and suppression* hearing scheduled to take place on April 24<sup>th</sup>; and (b) whether Mr. Atilla will seek to adjourn the August 21<sup>st</sup> trial date to some later date.

First, we have decided that we will not make any written submission on behalf of Mr. Atilla in connection with the *Curcio* and suppression hearing scheduled for April 24<sup>th</sup>. As the *Curcio* and suppression issues before the Court at this time relate solely to Mr. Atilla's co-defendant, we also respectfully request that Mr. Atilla be excused from appearing in court for these proceedings. We understand that the Court has made arrangements for an interpreter for Mr. Atilla for April 24<sup>th</sup>. In the event the Court excuses Mr. Atilla's attendance, we would respectfully remind the Court that the interpreter for Mr. Atilla will not be necessary.

Second, with respect to the adjournment of the trial date, Mr. Atilla now understands that, because of the many complexities and challenges presented by this case, it is in his interest, despite his being currently detained, that the August 21 trial date be adjourned for the reasons counsel set forth during the appearance on April 13th. Accordingly, we respectfully request that the Court allow us until May 27<sup>th</sup> — six weeks and a day from Mr. Atilla's arraignment and nine days following the *Curcio* hearing for Mr. Atilla which has been tentatively scheduled for May 18<sup>th</sup> — to return to the Court with a proposed new trial date.



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Respectfully submitted,  
HERRICK, FEINSTEIN LLP

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cc: All counsel of record (by ECF)

Defendant and counsel  
are required to attend on  
Monday, April 24, 2017 at  
10:30. He can discuss his  
position in open court then.

SO ORDERED:  
Date: 4/21/17 Richard M. Berman  
Richard M. Berman, U.S.D.J.